

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

THE BOEING COMPANY,	)	
	)	
<i>Plaintiff,</i>	)	
	)	Civil Action No. 22 CV 481
v.	)	
	)	Hon. Kenneth D. Bell
TEN OAKS MANAGEMENT, LLC,	)	
ANDREW LOVROVICH,	)	
DAVID RICHESON,	)	
MATTHEW MAGAN, AND	)	
MICHAEL HAHN.	)	
	)	
<i>Defendants.</i>	)	

**JOINT STIPULATION**

Plaintiff The Boeing Company (“Boeing”) and Defendants Ten Oaks Management, LLC (“Ten Oaks”), Andrew Lovrovich, David Richeson, Matthew Magan, and Michael Hahn, by and through their undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on September 14, 2022, Boeing filed its Complaint against Defendants Ten Oaks, Lovrovich, and Richeson [Dkt. 1];

WHEREAS, on September 16, 2022, the Complaint was served on Ten Oaks [Dkt. 4];

WHEREAS, on October 7, 2022, Boeing filed its First Amended Complaint against Ten Oaks, Lovrovich and Richeson, added as parties Defendants Magan and Hahn [Dkt. 5], and requested that Defendants Lovrovich, Richeson, Magan, and Hahn (together, the “Individual Defendants”) waive service of the First Amended Complaint [Dkt. 6-9];

WHEREAS, on October 18, 2022, the Individual Defendants waived service of the First Amended Complaint [Dkt. 10-13];

NOW THEREFORE, the Parties stipulate and agree as follows:

1. Defendants' deadline to file responses to the First Amended Complaint shall be December 6, 2022;
2. If any Defendant moves to dismiss, Plaintiff will file its opposition by January 5, 2022; and
3. The moving Defendant(s) will file their reply by January 20, 2023.

Dated: October 21, 2022

/s/ Joseph A. Mahoney

Joseph A. Mahoney  
N.C. State Bar No. 55318  
MAYER BROWN LLP  
214 North Tryon Street, Suite 3800  
Charlotte, NC 28202  
(704) 444-3654  
jamahoney@mayerbrown.com

J. Gregory Deis (*pro hac vice* application forthcoming)  
Sara Norval (*pro hac vice* application forthcoming)  
Andrew Spadafora (*pro hac vice* application forthcoming)  
MAYER BROWN LLP  
71 South Wacker Drive  
Chicago, IL 60606  
(312) 782-0600  
gdeis@mayerbrown.com  
snorval@mayerbrown.com  
aspadafora@mayerbrown.com

Glenn K. Vanzura (*pro hac vice* application forthcoming)  
MAYER BROWN LLP  
350 South Grand Avenue, 25th Floor  
Los Angeles, CA 90071  
(213) 229-9500  
gvanzura@mayerbrown.com

*Attorneys for Plaintiff The Boeing Company*

/s/ Patrick E. Kelly

Patrick E. Kelly  
N.C. State Bar No. 16703

Michael J. Hoefling  
N.C. State Bar No. 38246

Katie Burchette  
N.C. State Bar No. 45891

JOHNSTON, ALLISON & HORD, P.A.  
1065 East Morehead Street  
Charlotte, NC 28204  
(704) 332-1181  
pkelly@jahlaw.com  
[mhoefling@jahlaw.com](mailto:mhoefling@jahlaw.com)  
[kburchette@jahlaw.com](mailto:kburchette@jahlaw.com)  
*Attorneys for Defendants*